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September 29, 2021

MEMO ENDORSED

VIA ECF

Hon. Edgardo Ramos, U.S.D.J.
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

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Re: *Minnie Rose, LLC, et al. v. Anna Yu, et al.*, :15-CV-01923 (ER)(RLE)

Dear Judge Ramos:

I represent Plaintiff-Counterclaim Defendant Minnie Rose, LLC and Counterclaim-Defendant Lisa Shaller Goldberg (together, the “Plaintiffs”) in the above-referenced action. Please accept this letter as the parties’ joint status report and a further request that the Court amend the current scheduling order, which was entered on July 29, 2021 (Dkt. No. 92). I have met and conferred with Martin Mushkin, Esq., counsel for Defendants Anna Yu and Elva Green Clothing Company Ltd. (the “Defendants”), who has reviewed and joins in the contents of this letter.

A. Proceedings Since the Court’s July 29, 2021 Order

On August 31, 2021, Defendants served on Plaintiffs a letter in response to Plaintiffs’ letter of January 15, 2021, which alleged certain deficiencies in Defendants’ document production and requested that Defendants serve amended responses to Plaintiff’s First Set of Interrogatories. Plaintiffs concerns regarding Defendants document productions and interrogatory responses are not yet resolved and, after meeting and conferring, the parties believe it would be best to schedule depositions after resolving the issues raised in Plaintiffs’ letter of January 15, 2021 and Defendants response of August 31, 2021. The parties therefore request that the current scheduling order be amended as follows.

B. Proposed Amended Schedule

In consideration of counsels’ schedules in other matters, the parties propose the following schedule:

1. The parties shall meet and confer regarding the discovery dispute on or before October 22, 2021 and, if unable to resolve the dispute, Plaintiffs shall file a motion to compel no later than November 5, 2021;

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2. Depositions of party and non-party fact witnesses shall be completed by January 28, 2021. The parties shall cooperate so as to accommodate travel and other restrictions resulting from the COVID-19 pandemic, including consenting to depositions by Zoom or other video conference means when mutually agreeable to the parties;
3. Expert reports shall be served no later than March 11, 2022;
4. Rebuttal expert reports, if any, shall be served no later than April 8, 2022; and
5. Expert depositions shall be taken by April 29, 2022.

The parties respectfully request that the Court grant the requested amendments to the schedule and “so order” this letter.

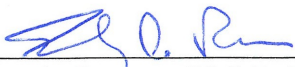
Sincerely,

/s/ Michael James Maloney

Michael James Maloney

cc: All counsel of record (via ECF)

The application is X granted
 denied



Edgardo Ramos, U.S.D.J.

Dated: 09/30/2021

New York, New York